

# **EXHIBIT A**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

19 RICHARD KADREY, *et al.*,  
20 Individual and Representative  
21 Plaintiffs,  
22 v.  
23 META PLATFORMS, INC., a Delaware  
24 corporation;  
25 Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFFS' FIFTH SET OF REQUESTS FOR  
PRODUCTION**

1       Meta objects to this Request because, on its face, it does not exclude documents and  
 2 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
 3 opinions, which are subject to attorney-client privilege and/or attorney work product  
 4 doctrine. Such documents will not be produced.

5       Meta objects to this Request as vague and ambiguous as to the phrasing "not identify" and  
 6 "databases used for training Llama Models." Meta construes this Request as seeking documents  
 7 concerning Meta's decision, if any, not to publicly identify with specificity the training data used  
 8 to train the Llama Models (as construed above) other than Llama 1.

9       Meta objects to this Request to the extent it assumes that Meta did not publicly identify  
 10 datasets used to train any Llama Models.

11      Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 12 needs of the case to the extent that it seeks all documents and communications concerning the  
 13 subject matter of the Request, including documents and communications with limited, if any,  
 14 relevance to Plaintiffs' copyright infringement allegations and Meta's defenses thereto.

15      Meta objects to this Request to the extent it seeks information that is not relevant to any  
 16 party's claims or defenses.

17 **REQUEST FOR PRODUCTION No. 118:**

18      All Documents and Communications, including source code, relating to any efforts,  
 19 attempts, or measures implemented by Meta to prevent Llama Models from emitting or outputting  
 20 copyrighted material.

21 **RESPONSE TO REQUEST No. 118:**

22      Meta incorporates by reference its objections and definitions above. Any electronic  
 23 communications, including emails and documents attached thereto, will only be produced pursuant  
 24 to and in accordance with the ESI Order.

25      Meta objects to this Request because, on its face, it does not exclude documents and  
 26 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
 27 opinions, which are subject to attorney-client privilege and/or attorney work product  
 28 doctrine. Such documents will not be produced.

1       Meta objects to this Request as vague, ambiguous, and indefinite as to “copyrighted  
 2 material,” as the Request does not identify any and Meta is not in a position to know whether any  
 3 particular work is subject to copyright protection. Meta construes this Request as seeking  
 4 documents concerning Meta’s training data memorization mitigations for the Llama Models (as  
 5 construed above).

6       Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 7 needs of the case to the extent that it seeks all documents and communications, including source  
 8 code, concerning the subject matter of the Request, including documents and communications with  
 9 limited, if any, relevance to Plaintiffs’ copyright infringement allegations and Meta’s defenses  
 10 thereto.

11       Meta objects to this Request to the extent it seeks information that is not relevant to any  
 12 party’s claims or defenses.

13       Meta objects to this Request as duplicative of other Requests, including Request No. 116.

14       Meta objects to this Request to the extent that Meta has already searched for and produced  
 15 documents responsive to this Request, which overlaps with prior Requests.

16       Subject to and without waiving the foregoing objections, and pursuant to the terms of the  
 17 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-  
 18 privileged, responsive documents in its possession, custody, or control, if any, sufficient to show  
 19 Meta’s training data memorization mitigations for the Llama Models (as construed above).

20 **REQUEST FOR PRODUCTION NO. 119:**

21       All Documents and Communications, including source code, relating to the processing of  
 22 copyrighted material used in training Llama Models, including storage and deletion of copyrighted  
 23 material.

24 **RESPONSE TO REQUEST NO. 119:**

25       Meta incorporates by reference its objections and definitions above. Any electronic  
 26 communications, including emails and documents attached thereto, will only be produced pursuant  
 27 to and in accordance with the ESI Order.

28       Meta objects to this Request because, on its face, it does not exclude documents and

1 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
 2 opinions, which are subject to attorney-client privilege and/or attorney work product  
 3 doctrine. Such documents will not be produced.

4 Meta objects to this Request as vague, ambiguous, and indefinite as to "copyrighted  
 5 material," as the Request does not identify any and Meta is not in a position to know whether any  
 6 particular training data is protected by copyright. Meta also objects to this Request on the ground  
 7 that it presupposes that there are documents related to the processing, storage, and deletion of  
 8 copyrighted material separate and apart from other training data.

9 Meta objects to this Request as duplicative of other Requests.

10 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 11 needs of the case to the extent that it seeks all documents and communications concerning the  
 12 subject matter of the Request, including documents and communications, including source code,  
 13 with limited, if any, relevance to Plaintiffs' copyright infringement allegations and Meta's defenses  
 14 thereto.

15 Meta objects to this Request to the extent it seeks information that is not relevant to any  
 16 party's claims or defenses.

17 Meta objects to this Request as duplicative of other Requests, including Request Nos. 116  
 18 and 118.

19 Meta is willing to meet and confer with Plaintiffs regarding the appropriate scope, if any of  
 20 this Request.

21 **REQUEST FOR PRODUCTION No. 120:**

22 All Documents and Communications, including source code, relating to actual or  
 23 contemplated source code changes within Llama Models, including source code "commits" and  
 24 "pull requests."

25 **RESPONSE TO REQUEST No. 120:**

26 Meta incorporates by reference its objections and definitions above. Any electronic  
 27 communications, including emails and documents attached thereto, will only be produced pursuant  
 28 to and in accordance with the ESI Order.

1 Dated: November 8, 2024

COOLEY LLP

3 By: /s/ Judd Lauter

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